

## **REMARKS**

The specification has been amended in paragraphs [0014] and [0020] to insert the subject matter of claims 2, 9, 11.

Claims 1-20 remain pending. Withdrawn claims 21-29, drawn to an unelected invention, have been cancelled. Claim 16 is amended to adopt the American English spelling of “liter.” Claims 1, 4, and 9 are amended to specify that the matter is metal particle matter; support for the amendment may be found throughout the original disclosure, including for example in paragraphs [0010]-[0014]. Claim 1 is amended to provide antecedent basis for the electrolyte medium of dependent claims 14-18.

### **Restriction Requirement Under 35 U.S.C. § 121**

A restriction requirement was applied between the invention of Group I, claims 1-20, to a method of separating adhered matter from a surface of a conductive substrate, and the invention of Group II, claims 21-29, to a method of applying coating on a vehicle part. Applicants provisionally elected the invention of Group I with traverse. Applicants now affirm the election of the invention of Group I, without traverse. The claims to the invention of Group II have, accordingly been cancelled.

### **Objection to the Specification**

The specification was objected to as failing to provide antecedent basis for the subject matter of claims 2, 9, and 11. The specification has been amended to copy the subject matter of claims 2, 9, and 11 into paragraphs [0014] and [0020].

Applicants, accordingly, respectfully request withdrawal of the objection.

Rejection Under 35 U.S.C. § 112, Second Paragraph

Claims 14-16 have been rejected as being indefinite for lack of antecedent basis for “the electrolyte medium.” Applicants respectfully traverse the rejection with respect to the claims as amended.

Claim 1 has been amended to provide antecedent basis for “the electrolyte medium.”

Applicants, accordingly, respectfully request withdrawal of the rejection and reconsideration of the claims.

Rejection Under 35 U.S.C. § 102(b) over Polan et al.

Claims 1, 2, 4-10, 14, 15, and 18 have been rejected as anticipated by Polan et al., U.S. Patent No. 4,568,431. Applicants respectfully traverse the rejection with respect to the amended claims.

Polan describes a process of electrolytic cleaning to remove “residual grease, oil and other contaminants” in column 5 cited in the Office Action. The electrolytic cleaning technique is said to “enhance the solvent action of the caustic [cleaning] solution” by the agitation produced by the hydrogen bubbles. Col. 5, lines 14-18. The Polan patent again equates cleaning with degreasing at the end of that paragraph. *Id.* at line 23. Again, in column 4, lines 60-61 and again at line 68, Polan teaches that it is bulk oil and grease that is removed in the cleaning step. Certainly, the Polan patent nowhere teaches or mentions any method for removing metal particulate materials from a surface of a conductive substrate.

Further, the Polan patent metal foil would not appear to have metal particle matter on its surface. In addition, the only source Polan mentions for its particulate filtered from its replenishment system is “from the atmosphere.” Col. 1, line 23; col. 12, line 50; col. 14, lines 5-

6. Thus, working from the Polan disclosure, one would have no reason to adopt the Polan cleaning step to the problem Applicants faced, and, even more telling, no expectation of success were one to do so.

Claim 18 is not anticipated by the Polan patent for the additional reason that the Polan patent does not teach or mention an electrolyte medium that comprises trisodium phosphate.

Applicants, accordingly, respectfully request withdrawal of the rejection and reconsideration of the claims.

Rejection Under 35 U.S.C. § 103(a) over Polan et al.

Claims 17, 19, and 20 have been rejected as unpatentable over Polan et al., U.S. Patent No. 4,568,431. Applicants respectfully traverse the rejection with respect to the amended claims.

Claims 17, 19, and 20 as amended are patentable over the Polan patent for the reasons provided in the foregoing section.

Applicants, accordingly, respectfully request withdrawal of the rejection and reconsideration of the claims.

Rejection Under 35 U.S.C. § 103(a) over Polan et al. in view of Lauke

Claim 3 has been rejected as unpatentable over Polan et al., U.S. Patent No. 4,568,431 in view of Lauke, U.S. Patent No. 4,568,438. Applicants respectfully traverse the rejection with respect to claim 3 as amended by the amendment of underlying independent claim 1.

The Lauke patent is cited as teaching an eductor. The Lauke patent does not, however, teach or suggest removing metal particle matter from a conductive substrate, and so fails to remedy or account for the deficiencies of the Polan patent.

Applicants, accordingly, respectfully request withdrawal of the rejection and reconsideration of claim 3.

Rejection Under 35 U.S.C. § 103(a) over Polan et al. in view of Sallo et al. or Smith

Claims 11-13 and 16 have been rejected as unpatentable over Polan et al., U.S. Patent No. 4,568,431 in view of Sallo et al., U.S. Patent No. 3,668,090 or Smith, U.S. Patent No. 4,270,986. Applicants respectfully traverse the rejection with respect to the claims as amended.

The Sallo and Smith patents, like the Lauke patent, do not teach or suggest removing metal particle matter from a conductive substrate, and so fails to remedy or account for the deficiencies of the Polan patent.

Applicants, accordingly, respectfully request withdrawal of the rejection and reconsideration of the claims.

### Conclusion

It is believed that all of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicant therefore respectfully requests that the Examiner reconsider and withdraw all presently outstanding rejections. It is believed that a full and complete response has been made to the outstanding Office Action, and as such, the present application is in condition for allowance. Thus, prompt and favorable consideration of this amendment is respectfully requested. If the Examiner believes that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at (248) 641-1600.

Respectfully submitted,



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